

Serial No. 10/822,749
OKI.621
Amendment dated January 16, 2007

Remarks/Arguments begin on page 13 of this paper.

REMARKS

Claims 2-14, 16-28, 31 and 32 are pending in the present application. Claims 2, 8, 11-13, 16, 17, 20, 22 and 25-27 have been amended. Claims 31 and 32 have been presented herewith. Claims 1 and 15 have been canceled.

Drawings

Two (2) drawing Replacement Sheets were submitted along with the Amendment dated August 7, 2006, correcting Figs. 16 and 20. The drawing Replacement Sheets have been entered into the image file wrapper of the present application on the U.S. Patent Office website. **The Examiner is respectfully requested to acknowledge receipt and acceptance of the drawing Replacement Sheets filed along with the Amendment dated August 7, 2006.**

Claim Rejections-35 U.S.C. 103

Claims 1-7, 15 and 17-21 have been rejected under 35 U.S.C. 103(a) as being unpatentable over the Mess et al. reference (U.S. Patent Application Publication No. 2002/0195697) in view of the Ohie reference (U.S. Patent No. 6,580,164). This rejection is respectfully traversed for the following reasons.

Claim 2 has been amended to be in independent form. The semiconductor device of claim 2 includes in combination among other features a die pad section "having a surface and a back surface"; a first semiconductor chip "having a surface on

which a first electrode section is formed, and a back surface fixed to the surface of the die pad section”; and a second semiconductor chip “having a surface on which a second electrode section is formed, and a back surface fixed to the surface of the first semiconductor chip”, wherein “an edge portion of the second semiconductor chip protrudes from an edge portion of the first semiconductor chip, an edge portion of the die pad section protrudes from the edge portion of the first semiconductor chip, and the edge portion of the die pad section further protrudes from the edge portion of the second semiconductor chip”. Applicant respectfully submits that the semiconductor device of claim 2 would not have been obvious in view of the prior art as relied upon by the Examiner for at least the following reasons.

The Examiner has primarily relied upon Fig. 12A of the Mess et al. reference as meeting the features of claim 2. However, the Mess et al. reference does not specifically illustrate in Fig. 12A or describe that the edge portion of central paddle 98 protrudes from the particular edge portion of semiconductor die 60B that protrudes from an edge portion of semiconductor die 60A, as would be necessary to meet the features of claim 2. The Fig. 12A embodiment of the Mess et al. reference does not decrease stress at the edge portion as in the present application. The Ohie reference as relied upon does not overcome this deficiency. Applicant therefore respectfully submits that the semiconductor device of claim 2 would not have been obvious in view of the prior art as relied upon by the Examiner taken singularly or together, and that this rejection of claims 2-7 is improper for at least these reasons.

The semiconductor device of claim 17 includes in combination among other features a first semiconductor chip; a second semiconductor chip and a die pad section "having a front surface and a back surface, the first semiconductor chip is fixed to said die pad section at a first region of the front surface, the front surface also including a second region that protrudes from the second side", wherein "the fourth side of the second semiconductor chip protrudes from the second side of the first semiconductor chip, and the second region further protrudes from the fourth side of the second semiconductor chip".

Applicant respectfully submits that the Mess et al. reference as relied upon does not specifically show in Fig. 12A or describe that a second region of central paddle 98 protrudes in particular from a fourth side of semiconductor die 60B that protrudes from a second side of semiconductor die 60A, as would be necessary to meet the features of claim 17. The Ohie reference as secondarily relied upon does not overcome these deficiencies. Applicant therefore respectfully submits that the semiconductor device of claim 17 would not have been obvious in view of the prior art as relied upon by the Examiner taken singularly or together, and that this rejection of claims 17-21 is improper for at least these reasons.

Claims 31 and 32

Applicant respectfully submits that claims 31 and 32 are generic. Applicant also respectfully submits that respective claims 31 and 32 would not have been obvious in

view of the prior art as relied upon by the Examiner for at least the same reasons as set forth above, by virtue of dependency upon claims 2 and 17 respectively. Moreover, Fig. 12A of the Mess et al. reference does not specifically show that semiconductor dies 60A and 60B are disposed so as to be contained within a perimeter of a surface of central paddle 98, as would be necessary to meet the features of respective claims 31 and 32.

Conclusion

Applicant respectfully submits that claims 2-7, 17-21, 31 and 32 should be allowable for at least the above reasons. Applicant also respectfully requests the Examiner to rejoin claims 8-14, 16 and 22-28, which should be allowable at least by virtue of dependency upon generic claims 1 and 15 respectively.

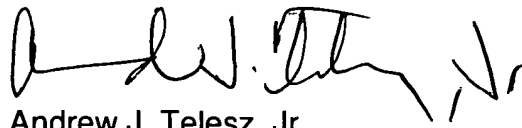
Accordingly, the Examiner is respectfully requested to reconsider and withdraw the corresponding rejection, and to pass all the claims of the present application to issue, for at least the above reasons.

In the event that there are any outstanding matters remaining in the present application, please contact Andrew J. Telesz, Jr. (Reg. No. 33,581) at (571) 283-0720 in the Washington, D.C. area, to discuss these matters.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment for any additional fees that may be required, or credit any overpayment, to Deposit Account No. 50-0238.

Respectfully submitted,

VOLENTINE & WHITT, P.L.L.C.

A handwritten signature in black ink, appearing to read "Andrew J. Telesz, Jr.", with a stylized flourish at the end.

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